

SEMENZA KIRCHER RICKARD
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
Telephone: (702) 835-6803

Lawrence J. Semenza, III, Esq., Bar No. 7174
Email: ljs@skrlawyers.com
Christopher D. Kircher, Esq., Bar No. 11176
Email: cdk@skrlawyers.com
Jarrod L. Rickard, Esq., Bar No. 10203
Email: jlr@skrlawyers.com
Katie L. Cannata, Esq., Bar No. 14848
Email: klc@skrlawyers.com
SEMENZA KIRCHER RICKARD
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
Telephone: (702) 835-6803
Facsimile: (702) 920-8669

*Attorneys for Defendants Jorge Cervantes
and CEC Industries, Inc.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

VANGUARD DEALER SERVICES, LLC
and MOTOR DEALER SERVICES GROUP,
LLC,

Plaintiffs,

v.

JORGE CERVANTES, CEC INDUSTRIES,
INC. d/b/a DEALERS DIRECT SYSTEMS
and/or DEALERS DIRECT
CONSULTANTS, and ROBERT KONZEN,

Defendants.

Case No. 2:21-cv-01121-JAD-EJY

**STIPULATION AND ORDER
CONTINUING DEADLINE FOR
DEFENDANTS JORGE CERVANTES
AND CEC INDUSTRIES, INC.'S
RESPONSIVE PLEADING TO
PLAINTIFFS' AMENDED
COMPLAINT**

(Second Request)

Plaintiffs Vanguard Dealer Services, LLC and Motor Dealer Services Group, LLC (together, "Plaintiffs") and Defendants Jorge Cervantes and CEC Industries, Inc. (together, "Defendants"), by and through their respective counsel of record, hereby submit this second stipulation to extend the time for Defendants to file a responsive pleading to Plaintiffs' Amended Complaint.

///

SEMENZA KIRCHER RICKARD
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
Telephone: (702) 835-6803

BACKGROUND

1
2 1. On August 16, 2021, Plaintiffs filed their Amended Complaint. (ECF No. 21.)

3 2. On August 24, 2021, counsel entered an appearance on behalf of Defendants.
4 (ECF No. 25.) That same day, counsel for Defendants signed an Acceptance of Service of the
5 Amended Complaint, which was subsequently filed on August 26, 2021. (ECF No. 26.)

6 3. As part of the agreement to accept service, the parties stipulated that Defendants
7 would have through September 27, 2021 to file a responsive pleading to the Amended
8 Complaint. A stipulation and order to that effect was filed with the Court on August 26, 2021
9 (the "First Stipulation to Extend"). (See ECF No. 27.)

10 4. On August 27, 2021, the Court entered an Order Granting the First Stipulation to
11 Extend. (ECF No. 28.)

12 5. While Defendants had anticipated being able to file a responsive pleading by
13 September 27, 2021, they require additional time to do so. In particular, Defendants' counsel is
14 continuing to review the underlying documents in this matter and is engaged in ongoing
15 discussions with Defendants. As such, Plaintiffs have agreed to Defendants' request for an
16 additional four (4) day extension of the responsive pleading deadline.

17 **STIPULATION**

18 NOW THEREFORE, the parties hereby agree and stipulate as follows:

19 1. The deadline for Defendants' responsive pleading to Plaintiffs' Amended
20 Complaint shall be continued to October 1, 2021.

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

2. This is the second stipulation for extension of time for Defendants to respond to Plaintiffs' Amended Complaint. The extension is requested in good faith and not for purposes of delay or prejudice to any other party.

DATED this 24th day of September, 2021.

DATED this 24th day of September, 2021.

SEMENZA KIRCHER RICKARD

AKERMAN LLP

/s/ Lawrence J. Semenza, III

/s/ Melanie D. Morgan

Lawrence J. Semenza, III, Esq., Bar No. 7174
Christopher D. Kircher, Esq., Bar No. 11176
Jarrod L. Rickard, Esq., Bar No. 10203
Katie L. Cannata, Esq., Bar No. 14848
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145

Melanie D. Morgan, Esq., Bar No. 8215
Scott R. Lachman, Esq., Bar No. 12016
1635 Village Center Circle, Suite 200
Las Vegas, Nevada 89134

*Attorneys for Defendants Jorge Cervantes
and CEC Industries, Inc.*

*Attorneys for Plaintiffs Vanguard Dealer
Services, LLC and Motor Dealer Services
Group, LLC*

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

September 24, 2021

DATED

SEMENZA KIRCHER RICKARD
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
Telephone: (702) 835-6803